

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

PROGRESSIVE AMERICAN
INSURANCE COMPANY,

Plaintiff,

v.

CAROL THORN, JOLEEN LEEA COLON;
DALE EUGENE KIRKINDOLL;
ELIZABETH S. KIRKINDOLL; THOMAS
HOLT KIRKINDOLL; JAMES W. GRIFFIN;
SANDRA L. GRIFFIN; PATRICK A. BELT;
CHRISTOPHER B. BELT; GENE STEGMAIER;
ESTATE OF WILLIAM R KLAUSS, a
deceased minor, LV STABLE MEMORIAL
HOSPITAL; DRPT. LAKE REHABILITATION
CENTER; BUTLER COUNTY EMERGENCY
MEDICAL SERVICES.

Defendants.

*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*

CIVIL ACTION NO: 2:06cv

**DEFENDANT'S REQUESTS FOR PRODUCTION TO PLAINTIFF PROGRESSIVE
INSURANCE COMPANY**

1. Please produce any and all documents relating to claims submitted by any of the defendant's including the place the claims were submitted, the date and to whom they were submitted.

2. Produce any and all documents stating the reserves set up for this claim and the persons for whom the reserves were set.

Respectfully submitted,

/s/ SIDNEY W. JACKSON, III
SIDNEY W. JACKSON, III(JAC024)
MATHEW B. RICHARDSON (RIC050)

JACKSON, FOSTER & GRAHAM, LLC'
Post Office Box 2225
Mobile, AL 36652
251-433-6699
251-433-6127

CERTIFICATE OF SERVICE

I hereby certify that I have on this day 11th of May, 2007, served a copy of the foregoing pleading with te Clerk of the Court using the CM/CEF system which will send notification of such filing to the following:

R. Larry Bradford, Esq.
BRADFORD & SEARS
2020 Canyon Road
Birmingham, AL 35216

Christopher L. Whittington, Esq.
WHITTINGTON & REYNOLDS
P.O. Box 3035
Baton Rouge, LA 70821-3035

/s/ SIDNEY W.JACKSON, III